

Vanessa R. Waldref
United States Attorney
Eastern District of Washington
Laurel J. Holland
Assistant United States Attorney
825 Jadwin Avenue
Richland, WA 99352
Telephone: (509) 353-2767

FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JUN 05 2024

SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICARDO VELAZQUEZ REYES,

Defendant.

INDICTMENT 4:24-CR-6015-MKD-1

Vio: 18 U.S.C. § 2252A(a)(2)(A), (b)(1)
Distribution of Child Pornography
(Count 1)

18 U.S.C. § 2252A(a)(2)(A), (b)(1)
Receipt of Child Pornography
(Count 2)

18 U.S.C. § 2252A(a)(5)(B), (b)(2)
Possession of Child Pornography
(Count 3)

18 U.S.C. § 2253
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Between on or about December 13, 2023, and March 5, 2024, in the Eastern
District of Washington, the Defendant, RICARDO VELAZQUEZ REYES, did

1 knowingly distribute child pornography, as defined in 18 U.S.C. § 2256(8)(A), that
2 had been mailed, shipped and transported in and affecting interstate and foreign
3 commerce by any means, including by computer, and that was transported via any
4 means or facility of interstate and foreign commerce, to wit: still images depicting
5 minor and prepubescent children engaging in sexually explicit conduct, including,
6 but not limited to, actual and simulated intercourse and the lascivious exhibition of
7 the genitals and pubic area, as defined in 18 U.S.C. § 2256(2)(A), all in violation
8 of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).
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12 COUNT 2
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14 Between on or about November 28, 2023, and March 30, 2024, in the
15 Eastern District of Washington, the Defendant, RICARDO VELAZQUEZ REYES,
16 did knowingly receive child pornography, as defined in 18 U.S.C. § § 2256(8)(A),
17 that had been mailed, shipped and transported in and affecting interstate and
18 foreign commerce by any means, including by computer, and that was transported
19 via any means or facility of interstate and foreign commerce, to wit: still images
20 depicting minor and prepubescent children engaging in sexually explicit conduct
21 including, but not limited to, actual and simulated intercourse and the lascivious
22 exhibition of the genitals and pubic area, as defined in 18 U.S.C. § 2256(2)(A), all
23 in violation of 18 U.S.C. § 2252A(a)(2)(A), (b)(1).
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COUNT 3

Between on or about December 13, 2023, and March 30, 2024, in the Eastern District of Washington, the Defendant, RICARDO VELAZQUEZ REYES, did knowingly possess material that contained one or more visual depictions of child pornography, as defined in 18 U.S.C. § 2256(8)(A), including images of prepubescent minors and minors who had not attained twelve years of age, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depictions were of such conduct; which had been mailed, shipped and transported in, or using any means or facility of, interstate and foreign commerce by any means, including by computer, and which were produced using materials that had been mailed, shipped and transported in or affecting interstate or foreign commerce, by any means including computer, all in violation of 18 U.S.C. § 2252A(a)(5)(B), (b)(2).

NOTICE OF FORFEITURE ALLEGATIONS

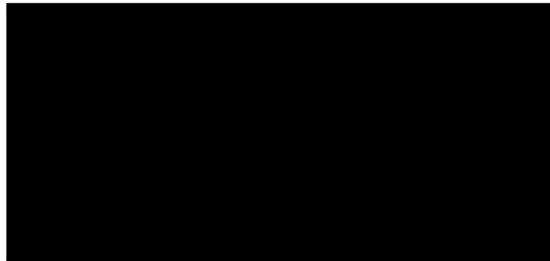
The allegations set forth in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 2253, upon conviction of any of the child pornography charges set forth in Counts 1, 2 or 3 of this Indictment, the Defendant, RICARDO VELAZQUEZ REYES, shall forfeit to the United States any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any

1 book, magazine, periodical, film, videotape, or other matter which contains any
2 such visual depiction, which was produced, transported, mailed, shipped or
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4 received in violation of this chapter; any property, real or personal, constituting or
5 traceable to gross profits or other proceeds obtained from such offenses; and, any
6 property, real or personal, used or intended to be used to commit or to promote the
7 commission of such offenses, or any property traceable to such property, including
8 but not limited to:
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- 11 - an MSI desktop computer;
- 12 - an ADATA 500 GB SSD; and,
- 13 - a Seagate 1TB HDD.

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15 DATED this 5th day of June, 2024.



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